

GOULSTON & STORRS, P.C.

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Douglas B. Rosner (DR-5690)

Gregory O. Kaden (GK-9610)

Counsel to 767 Fifth Partners LLC and

BP/CGCenter I LLC

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In re: : Chapter 11  
: Case No. 09-50026 (REG)  
MOTORS LIQUIDATION COMPANY, *et al.* : (Jointly Administered)  
: Debtors. :  
-----X

**MOTION PURSUANT TO RULE 2090-1(b) OF THE LOCAL RULES  
OF THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN  
DISTRICT OF NEW YORK FOR ADMISSION TO PRACTICE PRO HAC VICE**

I, Gregory O. Kaden, a member in good standing of the bar of the Commonwealth of Massachusetts and, *inter alia*, the United States District Court for the District of Massachusetts, request admission, *pro hac vice*, before the Honorable Robert E. Gerber in the above captioned chapter 11 cases. My address is Goulston & Storrs, P.C., 400 Atlantic Avenue, Boston, MA 02110-3333; email address is gkaden@goulstonstorrs.com; and telephone number is (617) 482-1776.

I agree to pay the fee of \$25 upon approval by this Court admitting me to practice *pro hac vice*.

Dated: New York, New York  
July 29, 2009

Respectfully submitted,

/s/ Gregory O. Kaden

Gregory O. Kaden (GK-9610)

GOULSTON & STORRS, P.C.

400 Atlantic Avenue

Boston, Massachusetts 02110-3333

Tel: (617) 482-1776

gkaden@goulstonstorrs.com

ORDERED, that Gregory O. Kaden, Esq. is admitted to practice, *pro hac vice*, in the above-captioned Case in the United States Bankruptcy Court, Southern District of New York, subject to payment of the filing fee.

Dated: New York, New York  
July \_\_, 2009

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United States Bankruptcy Judge

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**CERTIFICATE OF SERVICE**

I, Gregory O. Kaden, hereby certify that on this 29<sup>th</sup> day of July, I caused to be served a copy of the ***Motion Pursuant to Rule 2090-1(b) of the Local Rules of the United States Bankruptcy Court for the Southern District of New York for Admission to Practice Pro Hac Vice*** on the parties set forth on the attached Service List via ECF

/s/ Gregory O. Kaden

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Gregory O. Kaden, Esq. (GK-9610)  
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Stephen Karotkin, Esq. Weil Gotshal & Manges LLP 767 Fifth Avenue New York, NY 10153 <i>Counsel to the Debtors</i>	Office of the United States Trustee 33 Whitehall Street, 21 <sup>st</sup> Floor New York, NY 10004
Gordon Z. Novod, Esq. Kramer Levin Naftalis & Frankel LLP 1177 Avenue of the Americas New York, NY 10036 <i>Counsel to the Official Committee of Unsecured Creditors</i>	